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June 28, 2007

Hon. Laura Taylor Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *GMA v. BOP, LLC, et. al*
Docket No.: 07 CV 3219 (LTS)

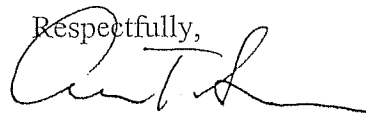
Your Honor:

I respectfully request your Honor's assistance involving defendant Jonathan Solnicki in the above matter. This defendant was served with the summons and amended complaint on May 29, 2007. The time within which this defendant should have answered or otherwise moved with respect to the Amended Complaint in this action has expired and no extension of time to answer has been granted or requested. We therefore requested an entry of default on June 27 from the Clerk. The Clerk's Certificate of Default pursuant to Rule 55(a) is respectfully annexed.

Pursuant to your Honor's Rules, I respectfully ask for permission to submit a proposed default judgment to your Honor as to liability and for the injunctive relief sought in the pleadings.

We are aware that it is typically difficult to compute the monetary damages in cases of this nature. *See e.g. GMA Accessories, Inc. v. Megatoys, Inc.*, 2003 WL 193507 (S.D.N.Y. 2003). As such, we respectfully ask that our submissions as to damages be deferred to a future date upon later application.

Respectfully,



Andrew T. Sweeney

cc: Jonathan Solnicki